

### **REMARKS**

Claims 1-16 are pending this application. Claims 1-5, 13, 15 and 16 were amended. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

#### ***Specification***

Per the Examiner's suggestion, Applicants have amended the specification to claim priority to Korean patent application serial number 2001-20237, filed April 16, 2001.

#### ***Claim Rejections under 35 U.S.C. § 102***

1. The Examiner rejected claims 1-14 under 35 U.S.C. 102(b) as being anticipated by Hubbell, et al. (U.S. Patent No. 5,996,121). Claims 1-5 and 13 were amended to remove the use of means plus function claiming. Applicants respectfully traverse this rejection.

Claim 1 reads, in part, "[a]n apparatus ... which comprises ... an editorial information processing unit for **converting the multimedia contents supplied from the user interfacing unit** on an object basis to the form applicable to an object-based internal material structure supporting the editorial information authoring, storing the converted contents, and **changing the form of the interactive multimedia contents information stored as the internal material structure to the file form** so as to perform an input or output process of the contents" (emphasis added). Hubbell does not disclose any "conver[sion of] the multimedia contents ... to the form applicable to an object-based internal material structure."

Hubbell clearly does not convert multimedia contents to any internal structure, let alone an "object-based" internal structure. Hubbell states that a multimedia file (AV<sub>s</sub>, see FIG. 9) is preferably of the AVI or BMP format, widely-used formats for video and still images, respectively. (Col. 10, line 65 – col. 11, line 27). These multimedia files are not converted to any "form applicable to an object-based internal material structure," but are rather treated as individual audio and video frames. (FIG. 9; Col. 21, line 65 to col. 22, line 14). Splitting video and audio files into their respective frames is clearly not "converting ... to an object-based internal material structure." Hubbell discloses no properties or methods attributed to the frame "objects." Rather, Hubbell just used the "mark files" to associate a frame with a hypervideo action. (Col. 5, lines 39-45).

Further, even if the hypervideo stream HV<sub>s</sub> were considered as the "internal material structure" (even though the hypervideo stream is not an internal structure, but rather an output format, sent to the audio and video controller), Hubbell does not disclose an editorial information processing unit for "changing the form of the interactive multimedia contents information stored as the internal material structure to the file form." Referring to FIG. 9 of Hubbell, the hypervideo stream is not changed into a file form (i.e., HV<sub>s</sub> never reaches the mass storage device for storage). In fact, it is quite apparent from the disclosure of Hubbell that the system of Hubbell does not support any modification of the multimedia file itself, but rather only associates actions with various frames of the multimedia file. In other words, there is no need to convert the Hubbell multimedia files to a "file form," because the Hubbell multimedia files themselves are not edited in any way, and therefore do not need to be stored.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 1. Claims 2-14 are believed allowable for at least the same reasons presented above with respect to claim 1 by virtue of their dependence from claim 1.

2. The Examiner rejected claims 15 and 16 under 35 U.S.C. 102(b) as being anticipated by Hubbell, et al. (U.S. Patent No. 5,996,121). Claims 15 and 16 were both amended to require that multimedia content provided by a user be converted into an internal object-based format. Applicants respectfully traverse this rejection.

Claims 15 and 16 are believed allowable for similar reasons as presented above with respect to claim 1 because claims 15 and 16, like claim 1, require that the multimedia content be converted into an internal object-based format. Hubbell does not disclose such a conversion. See above with respect to claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 15 and 16.

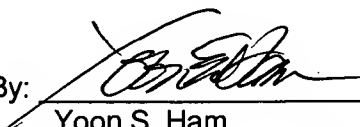
### **Conclusion**

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

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